

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**OPPOSITION TO THIRD PARTY SENATOR PATRICIA HARLESS'S ORIGINAL  
MOTION TO QUASH THE SUBPOENA FOR DEPOSITION**

Plaintiffs Texas NAACP and MALC have subpoenaed Representative Patricia Harless for her deposition. Representative Harless played a unique role in the legislative proceedings leading up to the enactment of SB 14, as the House sponsor of the bill. She was deposed in the Section 5 litigation, during which time she invoked legislative privilege to numerous questions posed by the Defendant and Defendant-Intervenors in that case. The Department of Justice has fully briefed the reasons why this deposition should go forward in the United States' Opposition to Texas Legislators' Motions to Quash Deposition Subpoenas (ECF 309), which briefing Plaintiffs incorporate herein by reference.

Without burdening this Court with additional argument, for the reasons set forth in the submission of the United States, Plaintiffs respectfully request that this Court deny Representative Harless's motion to quash.

Dated: June 6, 2014

Respectfully submitted,

s/ Ezra Rosenberg  
Ezra D. Rosenberg  
Michelle H. Yeary  
Dechert LLP  
902 Carnegie Center, Suite 500  
Princeton, New Jersey 08540-6531  
ezra.rosenberg@dechert.com

Steven B. Weisburd  
Amy L. Rudd  
Lindsey Cohan  
Dechert LLP  
500 W. 6th Street, Suite 2010  
Austin, Texas 78701  
lindsey.cohan@dechert.com

Wendy Weiser  
Myrna Pérez  
Vishal Agraharkar  
Jennifer Clark  
The Brennan Center for Justice at NYU Law School  
161 Avenue of the Americas, Floor 12  
New York, New York 10013-1205  
wendy.weiser@nyu.edu  
myrna.perez@nyu.edu  
vishal.agraharkar@nyu.edu  
jenniferl.clark@nyu.edu

Robert A. Kengle  
Mark A. Posner  
Sonia Kaur Gill  
Erandi Zamora  
Lawyers' Committee for Civil Rights Under Law  
1401 New York Avenue, N.W., Suite 400

Washington, D.C. 20005  
mposner@lawyerscommittee.org

Clay Bonilla  
The Law Offices of William Bonilla, P.C.  
2727 Morgan Ave.  
Corpus Christi, Texas 78405  
claybonilla@hotmail.com

Daniel G. Covich  
The Covich Law Firm LLC  
Frost Bank Plaza, Suite 2100  
Corpus Christi, TX 78405  
Daniel@covichlawfirm.com

Gary Bledsoe  
PotterBledsoe, L.L.P.  
316 West 12th Street, Suite 307  
Austin, Texas 78701  
garybledsoe@sbcglobal.net

Robert Notzon  
The Law Office of Robert Notzon  
1502 West Avenue  
Austin, Texas 78701  
Robert@NotzonLaw.com

Jose Garza  
Law Office of Jose Garza  
7414 Robin Rest Drive  
San Antonio, Texas 98209  
garzapalm@aol.com

Kim Keenan  
Marshall Taylor  
Victor Goode  
NAACP  
4805 Mt. Hope Drive  
Baltimore, Maryland 21215  
Telephone: (410) 580-5120  
kkeenan@naacpnet.org  
mtaylor@naacpnet.org  
vgoode@naacpnet.org

*Counsel for Plaintiffs Texas State Conference of  
NAACP Branches, Mexican American Legislative  
Caucus of the Texas House of Representatives*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document is being served by electronic mail on June 4, 2014, to all counsel of record.

/s Michelle Hart Yeary  
Michelle Hart Yeary